6.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the *2008 California Environmental Quality Act (CEQA) Statutes and Guidelines* states that an EIR must include a discussion of the following topics:

- Significant irreversible changes that could be caused by implementing a project
- Growth-inducing impacts of the proposed project

In addition, an EIR must identify any significant and unavoidable impacts associated with project implementation. The following sections address each of these types of impacts based on the analyses included in **Section 4.0, Environmental Setting, Impacts, and Mitigation Measures**.

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

An EIR must identify any significant irreversible environmental changes that could be caused by implementing a project. These may include current or future uses of non-renewable resources, and secondary or growth inducing impacts that commit future generations to similar uses. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified (*State CEQA Guidelines* Section 15126.2(c)). The *State CEQA Guidelines* describe three distinct categories of irreversible changes: (1) changes in land use that would commit future generation to specific uses; (2) irreversible changes from environmental actions, and (3) consumption of nonrenewable resources.

6.1.1 Changes in Land Use to Future Specific Uses

Implementation of the proposed project requires demolition of existing buildings and would result in the construction of an residential development. This development would occur on land that is already developed with a hospital and office buildings. The applicant is requesting approval for a Planned Development-Master Community (PD-MC) zoning district The PD-MC zoning permits "any residential, commercial, office, research and development; or public uses if they are in harmony with other authorized uses and serve to fulfill the function of the planned development while complying with the City's General Plan." The zoning change for this project would not affect future specific uses at the project site and in the project area, because the zoning only applies to the parcel on which the project would be located.

6.1.2 Irreversible Changes to the Physical Environment

The project site is currently developed with buildings, pavement, and landscaping. The proposed project would occupy the already developed space on the project site. Therefore, no irreversible changes to the physical environment are anticipated as a result of project construction or implementation.

6.1.3 Consumption of Natural Resources

The proposed project involves the creation of a diverse community, including a combination of high density and low density residential development. Development of this type would require the consumption of renewable and non-renewable resources. Given the changes to the project site, an irreversible commitment to the use of renewable and non-renewable resources during the construction and operation phases of the project would occur with project implementation.

Resources such as lumber and other forest products are generally considered renewable resources. Such resources would be replenished over the lifetime of the project. As such, the development of the project would not result in the irreversible commitment of renewable resources. Non-renewable resources, such as natural gas, petroleum based products, asphalt, petrochemical construction materials, steel, copper and other metals, etc., are considered to be resources that are only available in finite supply. Therefore, the replacement of these materials would not likely occur over the lifetime of the project.

The demand for renewable and non-renewable resources is expected to increase regardless of the development of the proposed project. If not consumed by the proposed project, these resources would likely be committed to other projects to meet the anticipated needs related to increases in population in the City of Santa Clara. Furthermore, the investment of resources in this project would be typical of the level of investment normally required for residential developments of this size.

6.2 GROWTH-INDUCING IMPACTS

This section evaluates the potential for growth inducement as a result of the proposed project implementation. Section 15126.2(d) of the *State CEQA Guidelines* requires that an EIR include a discussion of the potential for a proposed project to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

The *State CEQA Guidelines* do not provide specific criteria for evaluating growth inducement and state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth inducement is generally not quantified, but is instead evaluated as either occurring, or not occurring, with implementation of a project. The identification of growth-

inducing impacts is generally informational, and mitigation of growth inducement is not required by CEQA. It must be emphasized that the *State CEQA Guidelines* require that an EIR to "discuss the ways" a project could be growth inducing and to "discuss the characteristics of some projects that may encourage activities that could significantly affect the environment." However, the *State CEQA Guidelines* do not require that an EIR predict or speculate specifically where such growth would occur, in what form it would occur, or when it would occur.

For the purposes of this analysis, the proposed project would be considered growth inducing if it meets either of the following criteria:

- The project removes an obstacle to population growth (for example, through the expansion of public services or utilities into an area that does not presently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or General Plan land use designation.

- The project causes economic expansion and population growth through employment expansion, and/or the construction of new housing.

Generally, growth-inducing projects are either located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or are projects that encourage premature or unplanned growth. An evaluation of the Gallery at Central Park project and how it is related to these growth-inducing criteria is provided below.

6.2.1 Removal of an Impediment to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include non-existent or inadequate access to an area or the lack of essential public services (e.g., water services), and planning impediments may include restrictive zoning and/or general plan designations.

The project site is presently developed and is supplied by a full contingent of public services and utilities. The new residential units proposed by the project would connect to existing water, wastewater, gas, communications, and electrical lines that run through the project site or along the site boundary. Infrastructure improvements would occur within the project site, and would not require an expansion of Santa Clara Water Utility wastewater treatment or conveyance facilities, water supply, solid waste, or other infrastructure facilities that would provide capacity for future projects surrounding the project site. The proposed utilities and infrastructure upgrades would serve only the project. Therefore, the proposed utilities would enable growth envisioned for the proposed project, but would not induce growth beyond

that planned for the project site. Therefore, implementation of the project would not directly remove an obstacle to population growth.

Given that the project does not establish an essential public service and would be accommodated by existing public services, the project would not be considered growth inducing with respect to service/utility infrastructure.

The project would utilize the existing circulation system surrounding the project site and would make slight modifications to the entry points to the site. Kaiser Drive would be converted from a private roadway to a public roadway. As this roadway presently connects to Pepper Tree Lane, the roadway conversion would transfer responsibility of maintenance to the city and would not create any new access points. No driveways would be provided on Pepper Tree Lane or Miles Drive. Parcels 1 and 2 would have one primary access road entry and parking lot entrance from Kaiser Drive and one secondary access road entry from Kiely Boulevard. The secondary entry from Kiely Boulevard would be right-in/right-out only. Parcel 3 would maintain two driveway entries from Kaiser Drive and would eliminate the driveway along Kiely Boulevard. The proposed circulation changes are proposed to improve access for future residents and would not substantially alter access to areas of the city that were previously restricted. It would, therefore, not be considered growth inducing with respect to access.

Approval of the project would require a re-zoning on the project site would change from General Office and Professional Office to Planned Development-Master Community to reflect the proposed residential land uses. The re-zoning of the proposed project would not affect any other land uses within the city and any future re-zoning requests would be evaluated individually. Implementation of the Project would directly contribute to population growth in the area of approximately 2,080 residents. These increases in city population would be approximately 2 percent of the estimated Santa Clara population for 2007 and are anticipated in the City's estimated growth projections.

6.2.2 Economic Growth

The project would result in a temporary increase in construction-related job opportunities in the local area. However, employment opportunities provided by construction would not likely result in household relocation by construction workers to the vicinity of the project area. The construction industry differs from most other industry sectors in several ways, including the following:

- Construction employment has no regular place of business. Rather, construction workers commute to job sites that may change several times a year.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills.

- The work requirements of most construction project are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

Additionally, construction workers would likely be drawn from the construction employment labor force already residing in the City of Santa Clara and the surrounding communities and sub-region. It is not likely that construction workers would relocate their place of residency as a consequence of project implementation, as this would have a relatively short construction period. Employment opportunities provided by construction would not constitute a substantial growth in employment.

The project includes residential uses only, and thus, would not directly create any long-term employment opportunities. The new project residents could cause indirect economic growth in the area, through increased demand for local goods and services. It is possible that implementation of the project would contribute to the need for additional commercial uses in the area, but the contribution would be small. The type, extent, and locations of any such uses (and thus, the extent of related physical impacts) are not known.

The future residents on the project site could represent an addition to the region's labor force; it is not known to what extent people would move to the site from other sites within the region, or would be new residents to the region. The number of employed residents on the project site would be small in relation to the regional work force.

Given that implementation of the project would not represent a large increase in the population of the City of Santa Clara, and that the city is virtually built out, the opportunities for growth are limited. The increase in economic growth associated with the project would not contribute substantially to growth.

6.2.3 Conclusion

As discussed above, the project would not remove impediments to growth. The increased residential population would represent only a small percentage growth for the City of Santa Clara. Implementation of the project could lead to some economic growth in the area by increasing the demand for local goods and services. However, the extent to which such growth could occur is considered minimal. Therefore, implementing the project would not be considered growth inducing.

6.3 SIGNIFICANT AND UNAVOIDABLE EFFECTS

An EIR must identify any significant impacts associated with implementation of the proposed project that could not be mitigated to a less than significant level. No significant and unavoidable impacts were identified.